DIVISION OF ENVIRONMENTAL PROTECTION

GASTON CAPERTON
GOVERNOR

1356 Hansford Street
Charleston, WV 25301-1401

LAIDLEY ELI McCoy, Ph.D.
DIRECTOR

September 25, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUETED

Frances Wildenstein, Fleet Manager
Coyne Textile Services
P.O. Box 9097
Huntington, WV 25704

Dear Sir/Madam:

Enclosed is a copy of the **Compliance Schedule Evaluation Report** completed by representatives of the Chief from the Office of Waste Management. This report is based on the inspection conducted on March 1, 1995.

Please refer to the Notice of Violation for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

_____ Notice of Violation (NOV)
_____ Civil and Administrative Penalty (CAP)
_X_ Enforcement Referral

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please feel free to contact Inspector P. L. Brown at **(304) 256-6850**.

Sincerely,

Thomas A. Fisher
Inspector Supervisor

TAF/kw

cc: Jeanne Sofield, U.S. EPA, Region III
Inspector P. L. Brown
Civil and Administrative Enforcement
File

INSPECTION FACT SHEET

COMPANY NAME: Coyne Textile Services **ID#:** WVD052574753

MAILING ADDRESS: PO Box 9097
Huntington, WV 25704 **FACILITY TYPE:** SQG/Transporter

LOCATION: 1111 Vernon Street
Huntington, WV **COUNTY:** (99)Wayne

COMPANY CONTACT: Frances Wildenstein, Fleet Manager

PHONE: (304) 429-5585

PURPOSE: Compliance Schedule Evaluation (follow-up)

APPLICABLE REGULATIONS: **West Virginia Hazardous Waste Management Act, Chapter 22-18 and 40 CFR, Parts 260-265.**

LIST OF CHEMICALS:
[For Small Quantity Generators, list amount of waste, how it is handled and where it goes.]

D001/D018/D039----parts cleaner waste----16 gallons / 6 weeks----Safety Kleen.
D001---solvent-soaked shop cloths received from off-site for recycling.

DATE INSPECTED: March 1, 1995

INSPECTORS: **(1)** P L Brown

(2) D Cunningham

(3)

DATE PREPARED: August 8, 1995 **VIOLATIONS**_X____

PREPARED BY: P L Brown **NO VIOLATIONS**____

INSPECTION REPORT

On March 1, 1995, inspectors Dave Cunningham and Penny L. Brown, met with representatives of Coyne Textile Services (CTS) at the Huntington, WV facility for the purposes of conducting a follow-up of a compliance evaluation inspection conducted in April 1994. We were met on-site by Kris McCandless of Ogden Environmental, who is continuing with the site assessment begun in 1994. The representative was advised that this inspection would assess the facility's compliance with the WV Hazardous Waste Management Act and the Regulations promulgated thereunder.

The site assessment being conducted by Ogden Environmental initially involved kerosene spilled from an above ground tank. After chlorinated solvents were detected in the soil, these compounds were included in the assessment. The compounds found at the site were identified as tetrachloroethylene (PERC), trichloroethene (TCE), dichloroethene (DCE), methylene chloride, and chloroform.

The primary purpose of this phase of the site assessment was to plot the vertical and horizontal extent of the contamination plume from the kerosene spill. The samples collected were also screened for the presence of chlorinated hydrocarbons. A "Geo-Probe", operated by EnviroSurv personnel was used to collect samples from various depths in approximately 21 locations on the property. Field screening was conducted using a flame ionization detector (FID). Samples were analyzed on-site for BTEX and TPH by EnviroSurv's mobile laboratory.

As a result of this sampling the contamination plume from the kerosene release has been more fully mapped and included in Ogden's "Addendum #1 to the Site Characterization Report". From the map included in Ogden's "Addendum #1", it appears that part of the contamination plume has moved under the shop building. Remediation efforts by OSRC, the initial spill response contractor, were obviously incomplete. A summary of site conditions and risk assessment should be submitted to George Dasher, geologist with WVDEP-Office of Water Resources for further review. A copy of this inspection report is also being sent to Mr. Dasher.

One area near the back door to the shop contained relatively high concentrations of 1,2-dichloroethene (area of concern). This compound is gradually decomposed by air, light, and moisture to form hydrochloric acid. Chlorinated hydrocarbons were detected in the soil, indicating a past occurrence of disposal of hazardous waste. However, levels appear to be well below characteristic levels for hazardous waste. Quantities of chlorinated compounds found in the soil are also well below the USEPA Draft Soil Screening Level Guidance Document (1993) amounts for contaminated soils.

The underground storage tank (UST) which once contained supplemental fuel oil for the gas-fired boiler was re-sampled. While heating oil tanks are not governed under the UST Regulations, previous data indicated the possible presence of PERC / TCE inside the tank. Less than two inches of liquid were found in the tank. A disposable bailer was used to collect tank liquid into a one liter glass bottle for Ogden and into two 40 ml VOA containers as a "split" sample for WVDEP. The WVDEP sample was placed on ice and delivered to the WVDEP-Guthrie Center Laboratory on March 3, 1995 for SW846 Method 8260 analysis. Methylene chloride (17.5 ug/l) was detected in the WVDEP sample. A data qualifier note indicated that methylene chloride was present in the method blank as well as the sample, and that the reported result should be considered to be of questionable value. Ogden's sample was analyzed by Analytical Technologies, Inc. in Pensacola, Florida. Their analysis found no indication of the presence of

chlorinated hydrocarbons. Similar results from both laboratories were obtained indicating that this UST did contain a petroleum substance resembling heating oil and not chlorinated solvents.

The subsurface soil near the UST was sampled using the Geo-Probe. Samples were collected on the calculated down-gradient side at a depth which would be below the bottom of the tank. Again, while the presence of chlorinated hydrocarbons was detected, levels were below both hazardous waste and industrial waste clean-up levels.

Solvent-soaked rags from various customers are still laundered at this facility. I spoke to D J Smith, environmental engineer from CTS's environmental program. I advised him that this inspection was to assess the CTS's compliance with the WV Hazardous Waste Management Act and the Regulations promulgated thereunder. The representative said CTS is re-working their wastewater treatment to more effectively comply with discharge requirements of the Huntington Sanitary Board. The City of Huntington has had complaints before about solvent odors in the sewers near CTS.

We briefly discussed transport and cleaning of solvent-soaked shop rags. The CTS representative referred me to Mr. Bob Schaffer, director of environmental affairs, saying that CTS has written agreements with several states regarding this issue. West Virginia is not among those states having such an agreement with CTS at this time. One of the definitions of an ignitable hazardous waste is a solid waste which "...is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.[1]" Dirty solvent-soaked towels and rags are solid wastes prior to cleaning. Solvent-soaked rags or towels meet the NFPA Code definition of a spontaneously combustible material:

> "Combustible or loose waste materials that are generated by an establishment or process and, being salvageable, are retained for scrap or re-processing on the premises where generated or transported to a plant for processing. These include, but are not limited to, wood shavings, turnings, all types of paper products, soiled cloth trimmings and cuttings, rubber trimmings and buffings, metal fines, and any mixture of the above items, or other salvageable combustible waste materials.[2] "

The dirty solvent-soaked towels or rags transported and cleaned by CTS are therefore hazardous waste D001, and should be managed as such. Cleaning these solvent-soaked towels or rags to make them re-usable is a form of recycling. Hazardous wastes that are recycled are subject to the requirements for generators, transporters, and storage facilities of paragraphs (b) and (c) of 40 CFR Part 261.6. Coyne Textile Services transports this hazardous waste without proper manifests (non-compliance 1). Coyne Textile Services also stores this hazardous waste without a permit (non-compliance 2) and without complying with the applicable Subparts of 40 CFR Parts 264, 265, 124, 266, 268, and 270 (non-compliance 3). It should be noted that dirty shop towels or rags that do not contain solvent or other hazardous waste and which are to be cleaned and recycled are not solid waste and are not hazardous waste[3].

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[1]40 CFR Part 261.21(a)(2).

[2]NFPA 1, Chapter 2, definition.

[3]40 CFR Part 261.1(b)(1).

Shop towels and rags are normally brought to the facility in large laundry bags. During this and other inspections at CTS Huntington we have witnessed these laundry bags, most wet with solvent, being unloaded into wire hoppers. The bags remain in these hoppers until washed (storage prior to recycling). During one previous inspection, inspector Cunningham and I saw wire hoppers full of these solvent soaked laundry bags being stored outside on the back lot. A strong solvent odor emanating from these bags was noticeable from up to 75 feet away. More than one worker at this facility has told us of previous fires at the facility involving these rags. Once washed and dried the rags are transferred to wooden hoppers until folded and packaged for reuse.

During this inspection I saw pieces of a wooden hopper used to contain cleaned rags leaning up against the building by the boiler room door. The hopper pieces were burned and scorched, evidencing contact with fire. Beside the boiler room door and up on the gravel near the UST were charred pieces of cloth shop rags. The cause of this fire is unknown, but is an area of concern since it involved shop rags.

Other than use of a recyclable solvent in the parts cleaner in the shop area, no waste minimization measures were noted at this facility.

The non-compliances cited above are being referred to the administrative enforcement section for further action. The areas of concern discussed above should be addressed to avoid future violations of applicable regulations.

COMPLIANCE EVALUATION

Violations:

The following violations of the WV Hazardous Waste Management Act (§22-18, hereinafter the Act) and the WV Hazardous Waste Management Regulations (47 CSR 35, hereinafter the Regulations) were noted during this inspection:

1. Coyne Textile Services presently transports hazardous waste D001 without use of proper hazardous waste manifests, placarding, containers, etc. This is in violation of 40 CFR Part 263 Subpart B and Part 261.6(b) as referenced by Section 6.1 of the Regulations.

2. Coyne Textile Services presently stores hazardous recyclable waste without a permit. This is in violation of Section 8(a) of the Act.

3. Coyne Textile Services presently stores hazardous recyclable waste without complying with the applicable Subparts of 40 CFR Parts 264, 265, 124, 266, 268, and 270 . This is in violation of 40 CFR Part 261.6(c)(1) as referenced by Section 6.1 of the Regulations.

Concerns:

The following areas of concern were noted during this inspection:

1. One area near the back door to the shop contained relatively high concentrations of 1,2-dichloroethene. Removal of the kerosene-contaminated soil should eliminate this.

2. The cause of fire in the wooden hopper is unknown, but is an area of concern since it involved shop rags.

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ATTACHMENT 1:

WVDEP SAMPLE RESULTS FOR UST

Guthrie Center Laboratory WVDEP-OWR

Client ID:	Office of Waste Management	Date/Time Sampled:	3/1/95 @ 1230
Sample ID:	IV-591030-P	Date Received:	3/3/95
Lab ID:	GCL9502102	Date/Time Analyzed:	3/7/95 @ 1416
Sampled by:	P. L. Brown/K. McCandless	Analyzed by:	Dan Arnold

Project ID: RCRA

Method: SW846 Method 8260/EPA Method 624

Compound	CAS#	Result µg/L	TDL µg/L	Data Qualifier
dichlorodifluoromethane	75-71-8		50.0	U
chloromethane	74-87-3		50.0	U
vinyl chloride	75-01-4		50.0	U
bromomethane	74-83-9		50.0	U
chloroethane	75-00-3		50.0	U
trichloromonofluoromethane	75-68-4		50.0	U
1,1-dichloroethene	75-35-4		50.0	U
methylene chloride	75-09-2	17.5	5.0	B
trans-1,2-dichloroethene(E)	156-60-5		50.0	U
1,1-dichloroethane	75-34-3		50.0	U
2,2-dichloropropane	594-20-7		50.0	U
cis-1,2-dichloroethene(Z)	156-59-2		50.0	U
bromochloromethane	74-97-5		50.0	U
chloroform	67-66-3		50.0	U
1,1,1-trichloroethane	71-55-6		50.0	U
1,1-dichloropropene	563-58-6		50.0	U
carbon tetrachloride	56-23-5		50.0	U
benzene	71-43-2		50.0	U
1,2-dichloroethane	107-06-2		50.0	U
trichloroethene	79-01-6		50.0	U
1,2-dichloropropane	78-87-5		50.0	U
dibromomethane	74-95-3		50.0	U
bromodichloromethane	75-27-4		50.0	U
cis-1,3-dichloropropene(Z)	10061-01-5		50.0	U
toluene	108-88-3		50.0	U
trans-1,3-dichloropropene(E)	10061-02-6		50.0	U
1,1,2-trichloroethane	79-00-5		50.0	U
tetrachloroethene	127-18-4		50.0	U
1,3-dichloropropane	142-28-9		50.0	U
dibromochloromethane	124-48-1		50.0	U
1,2-dibromoethane	106-93-4		50.0	U
chlorobenzene	108-90-7		50.0	U
1,1,1,2-tetrachloroethane	630-20-6		50.0	U
ethylbenzene	100-41-4		50.0	U
m/p-xylene	106-42-3	103	5.0	
o-xylene	95-47-6	84.0	5.0	
styrene	100-42-5	2.8	5.0	K
bromoform	75-25-2		50.0	U

TDL-Target Detection Limit
CAS#-Chemical Abstract Service Number

Approved: J. Campbell
James A. Campbell, PhD

Client ID:	Office of Waste Management	*Date/Time Sampled:*	3/1/95 @ 1230
Sample ID:	IV-591030-P	Date Received:	3/3/95
Lab ID:	GCL9502102	Date/Time Analyzed:	3/7/95 @ 1416
Sampled by:	P. L. Brown/K. McCandless	Analyzed by:	Dan Arnold

Project ID: RCRA

Method: SW846 Method 8260/EPA Method 624

Compound	CAS#	Result µg/L	TDL µg/L	Data Qualifier
isopropylbenzene	98-82-8		50.0	U
bromobenzene	108-86-1	23.4	5.0	B
1,1,2,2-tetrachloroethane	79-34-5		50.0	U
1,2,3-trichloropropane	96-18-4		50.0	U
n-propylbenzene	103-65-1	9.4	5.0	
2-chlorotoluene	95-49-8		50.0	U
4-chlorotoluene	106-43-4		50.0	U
1,3,5-trimethylbenzene	108-67-8	44.0	5.0	
tert-butylbenzene	98-06-6		50.0	U
1,2,4-trimethylbenzene	95-63-6	17.5	5.0	
sec-butylbenzene	135-98-8		50.0	U
1,3-dichlorobenzene	541-73-1		50.0	U
p-isopropyltoluene	99-87-6	13.5	5.0	
1,4-dichlorobenzene	106-46-7		50.0	U
1,2-dichlorobenzene	95-50-1		50.0	U
n-butylbenzene	104-51-8	14.5	5.0	
1,2-dibromo-3-chloropropane	96-12-8		50.0	U
1,2,3-trichlorobenzene	87-61-6		50.0	U
hexachlorobutadiene	87-68-3		50.0	U
naphthalene	91-20-3	19.4	5.0	
1,2,4-trichlorobenzene	120-82-1		50.0	U

TDL-Target Detection Limit
CAS#-Chemical Abstract Service Number

Approved: J. Campbell
James A. Campbell, PhD

Guthrie Center Laboratory WVDEP-OWR

Client ID:	Office of Waste Management	*Date/Time Sampled:*	3/1/95 @ 1230
Sample ID:	IV-591030-P	Date Received:	3/3/95
Lab ID:	GCL9502102		
Sampled by:	P. L. Brown/K. McCandless		

Project ID: RCRA

Tentatively Identified Compounds

CAS#	Compound	Method	Result µg/L
124-18-5	Decane	8260	57
622-96-8	1-ethyl-4-methyl benzene	8260	89
1074-43-7	1-methyl-3-propyl benzene	8260	51
1120-21-4	Undecane	8260	171
1758-88-9	2-ethyl-1,4-dimethyl benzene	8260	55
527-84-4	1-methyl-2-(1-methylethyl) benzene	8260	86
99-87-6	1-methyl-4-(1-methylethyl) benzene	8260	80
2039-89-6	2-ethenyl-1,4-dimethyl benzene	8260	68
2039-90-9	2-ethenyl-1,3-dimethyl benzene	8260	146
112-40-3	Dodecane	8260	207
119-64-2	1,2,3,4-tetrahydro-naphthalene	8260	98
3877-19-8	1,2,3,4-tetrahydro-2-methyl-naphthalene	8260	53
17312-60-6	6-ethyl undecane	8260	59
2809-64-5	1,2,3,4-tetrahydro-5-methyl-naphthalene	8260	63
629-50-5	Tridecane	8260	266
1680-51-9	1,2,3,4-tetrahydro-6-methyl-naphthalene	8260	312
26730-12-1	4-methyl tridecane	8260	53
91-57-6	2-methyl naphthalene	8260	348
3891-98-3	2,6,10-trimethyl dodecane	8260	104
629-59-4	tetradecane	8260	254

Approved: _____
James A. Campbell, PhD

Data Qualifier Legend

U - Indicates that the parameter was analyzed for but not detected.

J - Indicates the presence of a parameter which met the identification criteria but was present at a concentration less than the method detection limit (MDL).

K - Indicates the presence of a parameter at a concentration above the MDL but less than the lowest concentration level of the calibration table.

B - Indicates that the parameter was present in the method blank as well as the sample. The reported result should be viewed with caution and should be considered to be of questionable value.

X - Indicates that the parameter was identified and/or quantitated after the designated holding time specified in the methodology. The reported value is for informational puposes only.

Note 1: The laboratory has established minimum target values for each parameter. These values reflect the lower limits that the laboratory expects to achieve on routine samples and for which there is a high level of confidence in the results. These are not necessarily the method or instrument detection limits. The actual detection limits used with the "U" qualifier will be dependent on the particular sample and the concentration/dilution actions required to perform the analyses within the working range of the instrument(s). The detection limits(TDL/MDL) for a sample will be the minimum target values or some multiple of the minimum target values.

Note 2: The reported results are not corrected for recoveries.

WEST VIRGINIA DIVISION OF ENVIRONMENTAL PROTECTION
GUTHRIE CENTER LABORATORY

ORGANICS SAMPLE SUBMISSION FORM

Submitted by: Hazardous Waste ✓ Monitoring _____ District Office _____ Other _____

Program: NPDES _____ CERCLA _____ RCRA ✓ Other _____

Sampling Site Identification: III-591030-P

Permit No. _____

Parameters

Purgeables
- ☐ 601 Halocarbons
- ☐ 602 Aromatics*
- ☐ 624 Volatiles*
- ☒ ~~8240~~ 8260 Volatiles*

*Preservative: _____

Base-Neutral-Acid Extractables
- ☐ 625 Semivolatiles
- ☐ 8270 Semivolatiles

Preservative: _____

Organochlorine Pesticides/PCBs
- ☐ 608 Wastewater Method
- ☐ 8080 Solid Waste Method

Preservative: _____

HCl Lot Number _____

Samples

Sampler: P Brown / K McCollum

Witness: _____

Sampling Point Identification				Composite	Grab	# of Containers	Water	Soil / Sediment	Oil	Other	Collection Date / Time	pH	Comments
Field No.	Latitude	Longitude	Laboratory No.	Sample Matrix									
01			GCL-	X		2				X	3/1/95 @ 1230	—	
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										
			GCL-										

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
P Brown	3/3/95 1325				
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	
		Daniel J. Chesbro	3/3/95 1325	Sediment in samples	

White - Laboratory Canary - Laboratory Pink - Inspector

STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES

RECEIPT FOR SAMPLES

Project Number	Project Name or Code	Name of Facility
	IV-591030-P	Coyne Textile Services

Samplers *(Signature)*: P L Brown

Facility Location: 1111 Vernon St Huntington, WV

Split Samples Offered: Y (Accepted) Declined

Station Number	Date	Time	Comp.	Grab	Split Samples	Tag Numbers	Station Description	No. of Containers	Remarks
01	3/1/95	12:30	X		Y		UST	2	VOA's

Transferred by *(Signature)*: Lisa L. McCallum - Ogden Environ.

Date: 3/1/95 Time: 1245

Received by *(Signature)*: P L Brown Telephone: 304-256-6850

Title: Env. Inspector Date: 3/1/95 Time: 1245

7/81 White - Facility Canary - Shipment Pink - Sampler's Copy

ATTACHMENT 2:

OGDEN SAMPLE RESULTS FOR UST

OGDEN FACSIMILE TRANSMITTAL

ENVIRONMENTAL & ENERGY SERVICES CO.
3211 Jermantown Road Fax Number: (703) 246-0939
Fairfax, Virginia 22030
(703) 246-0309

PLEASE DELIVER THE FOLLOWING PAGES TO:

NAME: Penny Brown
COMPANY: WVDEP
FAX NUMBER: 304-256-6755 or 6948
FROM: **KRIS K. McCANDLESS**
DATE: 5/12/95

Total number of pages 4 including cover page. If all pages are not received, please call 703-246-~~0500~~ 0309.

Penny:

Attached are total Halogenated Volatiles (8010) results and TPH Results for the UST tank liquids samples.

Report coming soon!

Kris

ANALYTICAL TECHNOLOGIES, INC. 11 East Olive Road Pensacola, Florida 32514 (904) 474-1001

"FINAL REPORT FORMAT - SINGLE"

Accession:	503244
Client:	OGDEN ENVIRONMENTAL AND ENERGY SERVICES CO., INC.
Project Number:	0-7066-0000-0002
Project Name:	CTS-HUNTINGTON, WV
Project Location:	HUNTINGTON, WV
Test:	TCO / PETRO. HYDROCARBON RANGE C6-C32
Analysis Method:	8015 / SW 846, 3rd Edition, September 1986 and Revision 1, July 1992
Extraction Method:	3510/SW-846, 3rd Edition, September 1986 and Revision 1, July 1992
Matrix:	LIQUID
QC Level:	I

Lab Id:	001		Sample Date/Time:	01-MAR-95 N/S
Client Sample Id:	UST-1		Received Date:	03-MAR-95
Batch: FPW043			Extraction Date:	08-MAR-95
Blank: A	Dry Weight %:	N/A	Analysis Date:	10-MAR-95

Parameter:	Units:	Results:	Rpt Lmts:	Q:
TOTAL PETROLEUM HYDROCARBON	UG/L	290000	10000	
HYDROCARBONS QUANTITATED USING	N/A	(+)		
ORTHO TER PHENYL	%REC/SURR	D	37-140	
ANALYST	INITIALS	SJF		

Comments:
D = DILUTED OUT.
(+) DIESEL RANGE C10-C28.

ANALYTICAL TECHNOLOGIES, INC. 11 East Olive Road Pensacola, Florida 32514 (904) 474-1001

"FINAL REPORT FORMAT - SINGLE"

Accession: 503244
Client: OGDEN ENVIRONMENTAL AND ENERGY SERVICES CO., INC.
Project Number: 0-7066-0000-0002
Project Name: CTS-HUNTINGTON, WV
Project Location: HUNTINGTON, WV
Test: HALOGENATED VOLATILES (8010)
Analysis Method: 8010 / SW 846, 3rd Edition, September 1986 and Revision 1, July 1992
Extraction Method: N/A
Matrix: LIQUID
QC Level: I

Lab Id: 001 Sample Date/Time: 01-MAR-95 N/S
Client Sample Id: UST-1 Received Date: 03-MAR-95

Batch: LUW039 Extraction Date: N/A
Blank: B Dry Weight %: N/A Analysis Date: 15-MAR-95

Parameter:	Units:	Results:	Rpt Lmts:	Q:
BROMODICHLOROMETHANE	UG/L	ND	1	
BROMOFORM	UG/L	ND	2	
BROMOMETHANE	UG/L	ND	2	
CARBON TETRACHLORIDE	UG/L	ND	1	
CHLOROBENZENE	UG/L	ND	1	
CHLOROETHANE	UG/L	ND	5	
2-CHLOROETHYLVINYLETHER	UG/L	ND	5	
CHLOROFORM	UG/L	ND	2	
CHLOROMETHANE	UG/L	ND	5	
DIBROMOCHLOROMETHANE	UG/L	ND	5	
1,2-DICHLOROBENZENE	UG/L	ND	2	
1,3-DICHLOROBENZENE	UG/L	ND	2	
1,4-DICHLOROBENZENE	UG/L	ND	2	
DICHLORODIFLUOROMETHANE	UG/L	ND	5	
1,1-DICHLOROETHANE	UG/L	ND	1	
1,2-DICHLOROETHANE	UG/L	ND	1	
1,1-DICHLOROETHENE	UG/L	ND	1	
1,2-DICHLOROETHENE (TOTAL)	UG/L	ND	1	
1,2-DICHLOROPROPANE	UG/L	ND	1	
CIS-1,3-DICHLOROPROPENE	UG/L	ND	1	
TRANS-1,3-DICHLOROPROPENE	UG/L	ND	1	
METHYLENE CHLORIDE	UG/L	ND	5	
1,1,2,2-TETRACHLOROETHANE	UG/L	ND	1	
TETRACHLOROETHENE	UG/L	ND	3	
1,1,1-TRICHLOROETHANE	UG/L	ND	1	
1,1,2-TRICHLOROETHANE	UG/L	ND	2	
TRICHLOROETHENE	UG/L	ND	1	
TRICHLOROFLUOROMETHANE	UG/L	ND	2	
VINYL CHLORIDE	UG/L	ND	1	
BENZYL CHLORIDE	UG/L**	ND	5	
BIS 2-CHLOROETHOXY METHANE	UG/L**	ND	50	
BIS 2-CHOROISOPROPYL ETHER	UG/L**	ND	50	
BROMOBENZENE	UG/L**	ND	3	
CHLOROACETALDEHYDE	UG/L**	ND	50	
CHLOROMETHYLMETHYL ETHER	UG/L**	ND	50	
2-CHLOROTOLUENE	UG/L**	ND	1	

ANALYTICAL TECHNOLOGIES, INC. 11 East Olive Road Pensacola, Florida 32514 (904) 474-1001

"FINAL REPORT FORMAT - SINGLE"

Accession: 503244
Client: OGDEN ENVIRONMENTAL AND ENERGY SERVICES CO., INC.
Project Number: 0-7066-0000-0002
Project Name: CTS-HUNTINGTON, WV
Project Location: HUNTINGTON, WV
Test: HALOGENATED VOLATILES (8010)
Analysis Method: 8010 / SW 846, 3rd Edition, September 1986 and Revision 1, July 1992
Extraction Method: N/A
Matrix: LIQUID
QC Level: I

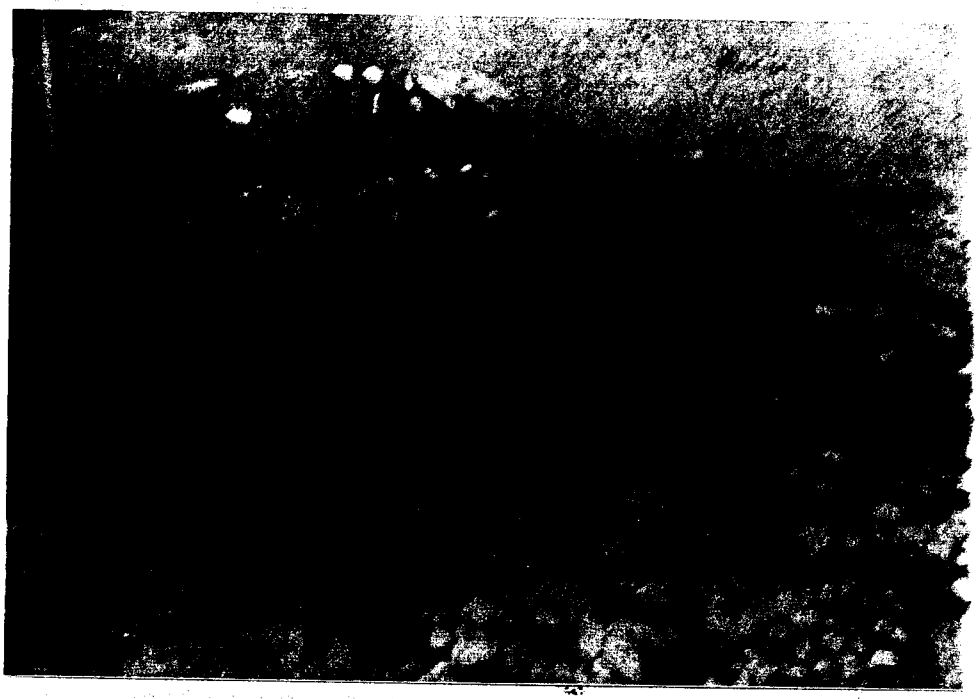
Lab Id: 001
Client Sample Id: UST-1
Sample Date/Time: 01-MAR-95 N/S
Received Date: 03-MAR-95

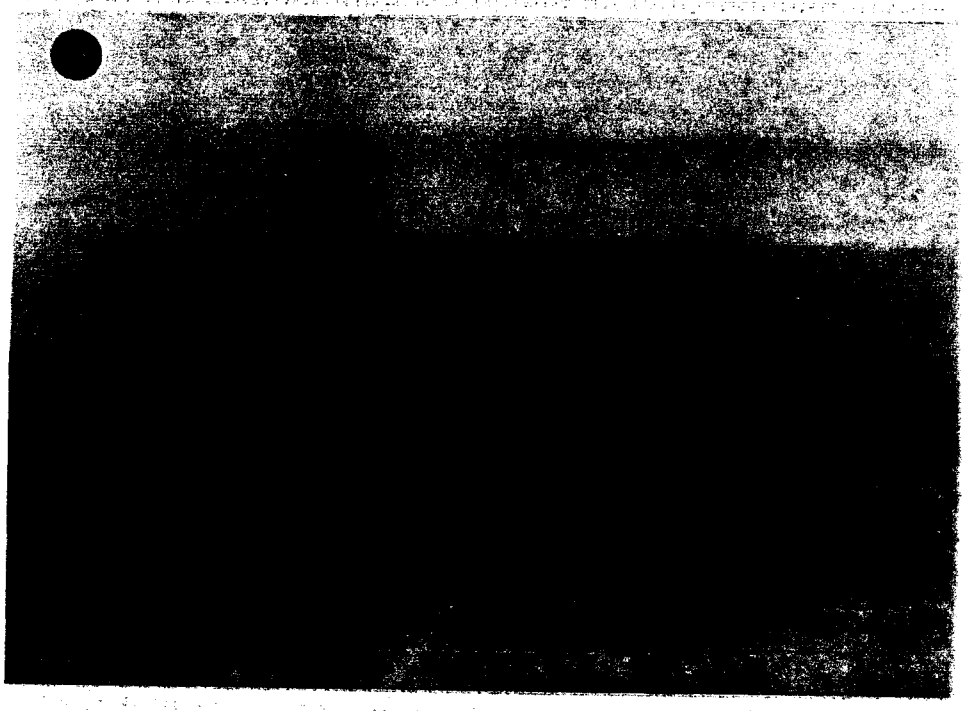
Parameter:	Units:	Results:	Rpt Lmts:	Q:
DIBROMOMETHANE	UG/L**	ND	5	
1,1,1,2-TETRACHLOROETHANE	UG/L**	ND	1	
1,2,3 TRICHLOROPROPANE	UG/L**	ND	5	
1-CHLOROHEXANE	UG/L**	ND	5	
BROMOFLUOROBENZENE (ELCD)	%REC/SURR	83	75-137	
ANALYST	INITIALS	SR		

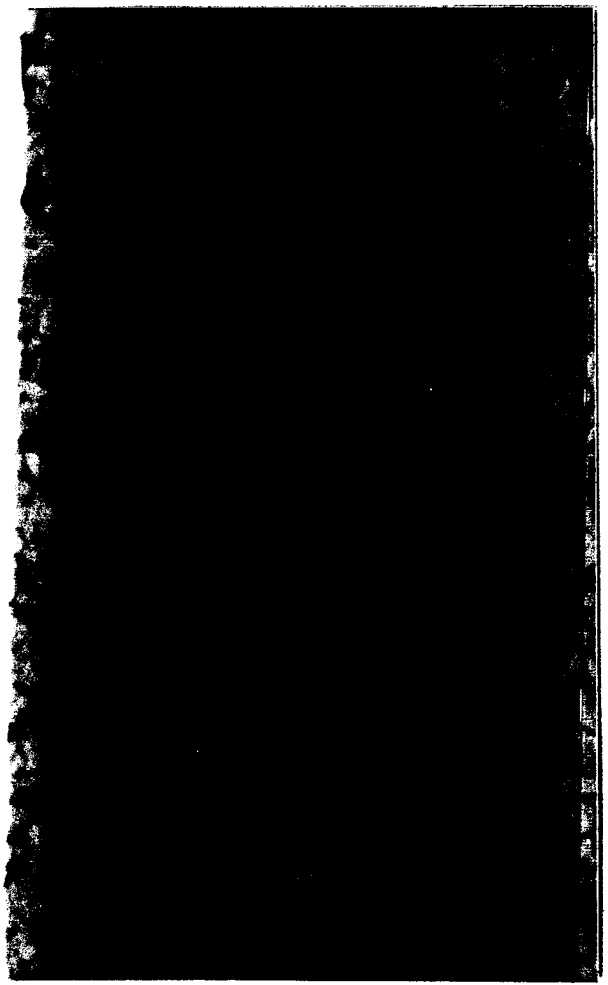
Comments:

ATTACHMENT 3:

PHOTOS & PHOTO LOG







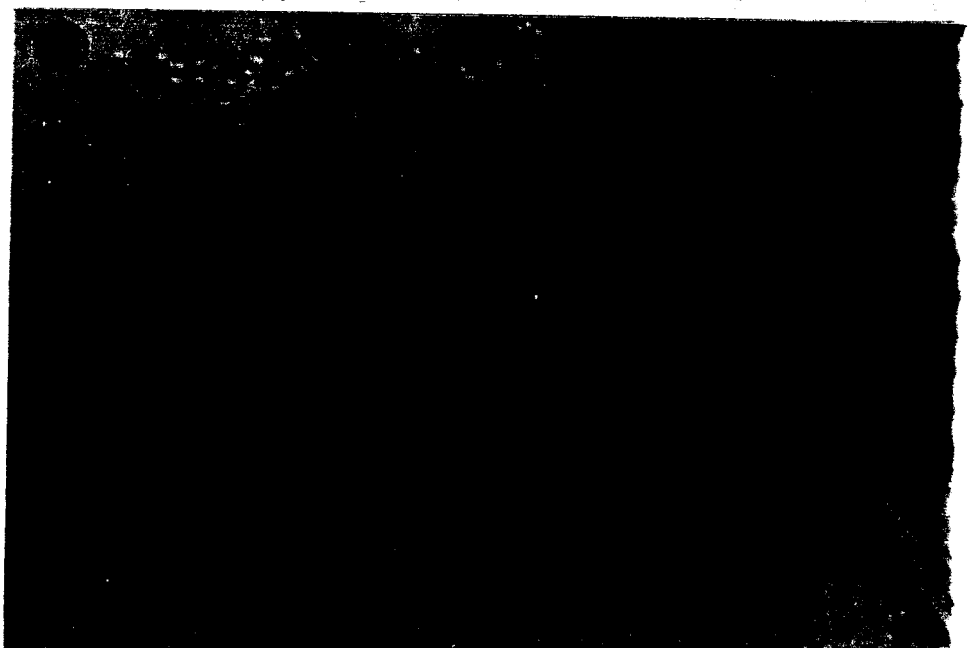


PHOTO LOG

Facility Name: Coyne Textile Services **Location:** Huntington, WV (Wayne Co.)

1	2	3	4	5	6
1	Kodacolor Gold DX 400 Exp 5/96	fixed	Cloudy/ cool	3/1/95	Sample being collected through one of the UST ports. Sample of UST contents in 1 liter jar and in VOAs in background.
2	" "	" "	" "	" "	Photo taken by boiler room door. Burn marks on piece of wooden hopper used to contain shop rags.
3	" "	" "	" "	" "	Photo taken by boiler room door. Remains of burned wooden hopper at Left, burned shop rag on concrete.
4	" "	" "	" "	" "	Charred pieces of rags on gravel near UST, just above boiler room door.

Photographer's Signature: P L Brown

1. Photo Number
2. Film Description
3. Focal Length/F-Stop/Shutter Speed
4. Weather
5. Date/Time
6. Description of Photo

FILM TURNED OVER TO: Foto 1--Crossroads Mall

FOR DEVELOPING ON: 4/5/95 **RECEIVED ON:** 4/5/95